FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
In the Matter of

Cross-Ownership of Broadcast Stations and Newspapers MM Docket No. 01-235 Newspaper/Radio Cross-Ownership Waiver Policy MM Docket No. 96-197

Comments of The E. W. Scripps Company
Kenneth W. Lowe, President and Chief Executive Officer
Alan M. Horton, Senior Vice President/Newspapers
John F. Lansing, Vice President/Television
M. Denise Kuprionis, Vice President/Legal Affairs
The E. W. Scripps Company, Scripps Center, 312 Walnut Street, Suite 2800,
Cincinnati, Ohio 45202

February 15, 2002

SCRIPPS SUPPORTS CROSS-OWNERSHIP IN ALL MARKETS
Reply Comments to the Federal Communications Commission
Newspaper/Broadcast Cross-Ownership Rulemaking

High-quality convergence journalism is extremely difficult under two ownership umbrellas. Differing work schedules, employee policies, resources and corporate cultures must be bridged. The planning takes months. Coordination distracts two sets of supervisors. The limit seems to be one or two joint projects a year.

Under common ownership, shared resources would free up time for serious multi-media journalism, improving the quality of each medium. Daily cross-promotion between media would build stronger audiences for each medium.

Today, many newspaper communities are served by television stations that lack the resources to go very far beyond sound-bite reporting. Newspapers can provide more depth than broadcasters but face a shrinking audience for printed news. The scores - even hundreds - of Web sites in some communities are not able to offer a full compendium of public information.

Cross-ownership would permit the development of community-oriented news operations that could build higher quality and more robust audiences across the board. Better citizen education and stronger communities would result.

Joint reporting tests with broadcast outlets in several of our cities show what would be possible every day under common ownership. Examples from several markets:

The Knoxville News Sentinel and WBIR-TV joined to present a comprehensive examination of day care services in East Tennessee. A team of print, Web and broadcast journalists created the project. Highlights: A video segment followed a day care inspector through a center, showing parents what the experts look for in evaluating day care centers. Print segments told the day care experience through the eyes of service providers, parents and children. A searchable Web database guided parents to every day care provider in East Tennessee, with information on size, ratings, services, address, cost and contact details. Because of the collaboration, this valuable report reached virtually every household in a nine-county region.

A second project by these two Knoxville news organizations examined a

proposed state lottery - giving voice to all shades of opinion, providing detailed information about state budget impact, sharing other states' experiences with lotteries and providing Web links to even more information about state lotteries and lottery-related budget practices. The lottery project can be seen at the organizations' shared Web site for joint reporting projects, http://www.tnreports.com.

The Corpus Christi Caller-Times and KRIS-TV joined to ask why Corpus Christi was not keeping up with the economic development and quality of life improvements of other Gulf Coast cities. Their report engaged the community, galvanizing it into a discussion that no one news medium could have provoked. With strong citizen support, the city now is working across a broad front to improve services for its residents.

In a project that recently was voted by a panel of outside judges as the best multi-media journalism of 2001, the two Corpus Christi partners explored the city's problem of persistently high drop-out rates in its schools. Aimed at young people, the project showed - through real-life examples - the long-term consequences of leaving school. Then it introduced young people to drop-outs who had overcome those consequences by completing their educations and working their way into the economic mainstream. This project can be found at http://www.caller.com/dropouts.

Our broadcast stations are joining with other newspaper companies in an effort to bring about the type of coverage noted above. An example - WEWS and the Akron Beacon Journal co-sponsored a live, prime time town meeting on race reporting in media with Sam Donaldson and Cokie Roberts hosting. The newspaper followed the next morning with front-page coverage of the event. Under common-ownership, more projects like this could be undertaken resulting in a better informed public and stronger communities.

The E.W. Scripps Company is a diverse media concern with interests in newspaper publishing, broadcast television, national television networks and interactive media. Scripps operates 21 daily newspapers, 10 broadcast TV stations and three cable television networks, with plans to launch a fourth.

Scripps national television network brands include Home & Garden Television, Food Network, Do It Yourself and Fine Living, due to launch in March 2002.

The company also operates Scripps Howard News Service, United Media, the worldwide licensing and syndication home of PEANUTS and DILBERT, and 31 Web sites, including hgtv.com, foodtv.com, diynet.com and comics.com.

M. Denise Kuprionis, Esq.

The E. W. Scripps Company

Vice President

Corporate Secretary/Director of Legal Affairs

email: kuprionis@scripps.com

phone: 513/977-3835 fax: 513/977-3811

CONFIDENTIALITY NOTICE: This e-mail is intended solely for the recipient(s) listed in the heading. Unless otherwise noted, it may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination, or use of this material or its contents by persons other than the addressee is strictly prohibited. If you have received this message in error, please notify the sender and delete the

message. Thank you.